

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA
FLORENCE DIVISION

FILED

OCT 29 2004

LARRY W. PROPPS, CLERK
FLORENCE, SC

UNITED STATES OF AMERICA,) CIVIL ACTION NO. 4:04-22094-27
)
Plaintiff,)
)
vs.)
) PETITION
)
ARTHUR LARRY FREEMAN, JR.,)
) Individually and As)
) Personal Representative of)
) the Estate of ERNESTINE)
) BONILLA; KHRISTEN DION)
) FREEMAN and QUINTELL)
) FREEMAN, Heirs-at-Law and)
) Devises Under the Last)
) Will and Testament of)
) ERNESTINE BONILLA,)
) Deceased, THE BELK CENTER,)
) HORRY COUNTY EMERGENCY)
) MEDICAL SERVICE, CITICORP)
) CREDIT SERVICES INC., and)
) CONWAY HOSPITAL, INC.,)
)
Defendants.)

TO: THE HONORABLE UNITED STATES DISTRICT JUDGE

Your petitioner would respectfully show that the above entitled action is one to foreclose a mortgage on property situated in Horry County, South Carolina, and that there is a minor who has an interest in the property, this minor being Quintell Freeman; that this defendant is in default even though she and the person with whom she resides were served with a copy of the notice that the plaintiff would apply for the appointment of a suitable guardian ad litem to represent them in this matter

if they did not do so within thirty (30) days after service. The thirty (30) days have expired and neither the minor defendant nor the person with whom he resides have applied for the appointment of a guardian ad litem; and

Therefore, inasmuch as some suitable and competent person should be appointed as guardian ad litem for this minor defendant, pursuant to Federal Rules of Civil Procedure, 17(c), your petitioner prays that Ronald R. Hall, Esquire, a competent attorney, in good standing with the Bar of South Carolina, be so appointed.

J. STROM THURMOND, JR.
United States Attorney

By: 

ROBERT F. DALEY, JR. (ID #6460)
Assistant United States Attorney

Columbia, South Carolina

Oct. 27, 2004